

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN
MCDONALD, and THE ESTATE OF CHERRIGALE
TOWNSEND,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC, and
WARNER MUSIC GROUP CORPORATION, d/b/a
ASYLUM RECORDS

Defendants.

ECF CASE

17-cv-5221 (LLS)

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants Edward Christopher Sheeran, p/k/a Ed Sheeran, Atlantic Recording Corporation d/b/a Atlantic Records and Sony Music Publishing (US) LLC (f/k/a Sony/ATV Music Publishing LLC) (collectively, the “Defendants”) respectfully request that the Court ask the following voir dire questions of all proposed jurors, with the understanding that the Court may have a standard set of questions asked of all prospective jurors. Defendants respectfully reserve the right to modify, amend, or supplement the following proposed voir dire questions.

I. DEFENDANTS' PROPOSED VOIR DIRE

1. Please state your full name, age, and juror number.
2. Have you ever used another name? If so, please explain the circumstances of changing your name.
3. Are you available to serve as juror in this case every day for the following two weeks?
4. What is the highest level of education you have completed and any special licenses or certificates you hold?

5. If you attended college or beyond, what did you major in or study?
6. Have you ever played a musical instrument or sung or performed musically in any way? If so, please describe.
7. Current work status?
8. Current or most recent occupation and employer?
9. Past employers over last 10 years?
10. Have you ever belonged to a union? If so which and when?
11. Are you married or do you have a significant other? If so, does he or she work? If yes, what do they do?
12. Do you have children? If so, what are their ages, are they in school or working? If they are working, what do they do?
13. Have you or any close family or friend had any experience with adopted or foster children?
14. How long have you lived at your current address and do you own or rent?
15. Have you been involved in a lawsuit as a plaintiff? As a defendant? As a witness? As a juror?
 - a. If so, please explain what the case(s) were about.
16. Have you ever filed or considered filing any of the following types of complaints:
 - a. employment complaint?
 - b. worker's compensation?
 - c. EEOC complaint (Equal Employment Opportunity Commission)?
 - d. HR complaint due to feeling your rights were violated (whether due to sexual orientation, gender, race, religion, or other reasons)?

If so, please explain.

17. Have you or someone very close to you suffered from drug or alcohol issues or mental health challenges? If the answer is yes and you would prefer to address it with the Judge privately, please say so.
18. If you take care of a young child or young children, someone sick, elderly or with special needs, please explain.
19. If you have any physical, mental, or emotional condition, or take any medication that might affect your memory or concentration, please explain.
20. Do you feel that serving as a juror on a trial might pose a significant hardship to you physically, mentally or financially, or to your family, or financial circumstances, and could interfere with your ability to give 100% of your attention, to take in information and remember it for a trial lasting 1-2 weeks? If so, please explain.
21. Have you experienced any of the following in the past few years: serious health issues, hospitalization, death of a loved one, change in marital status, or serious financial hardship? If so, please explain.
22. Do you have any strong negative opinions about celebrities? If so, please explain.

23. Is there any reason you could not treat both sides in this case equally?
24. Have you ever created something or come up with an idea for something for which you believe you didn't receive proper credit? If so, can you explain what happened and the outcome?
25. Do you consider yourself to be an artistic or creative person in any way? If so, please describe what you do and how you've pursued it, if at all.

26. Are you a member of or do you donate any money or time to any groups, organizations or charities, including religious, political or professional ones? If so, which one(s)?
27. Do any moral or religious beliefs prevent you from standing in judgment of others as a juror? If yes, please explain.
28. How do you like to spend your free time?
29. What is your main source of news and how often do you read or watch the news?
30. Do you blog or actively or frequently post or comment on social media such as Facebook, Twitter or Instagram?
- a. If so, what about?
31. Have you attended or participated in any protests, marches or rallies?
- a. If so, please describe.
32. How often do you listen to music, if at all?
33. What kind or types of music do you listen to?
34. Are you familiar with the songwriter Ed Townsend?
35. Have you ever heard the song “Let’s Get It On”?
36. Are you familiar with the recording artist Marvin Gaye? If so, what do you know?
37. Have you ever heard the song “Thinking Out Loud?”
38. Have you ever tried to copyright anything?
- a. If so, please describe.
39. Have you or any close family members or close friends ever been involved in a dispute involving copyright infringement or a dispute over a Will or inheritance? If so, please describe.

40. Have you read, heard, or seen anything about a lawsuit involving Ed Sheeran, including anything on social media?

- a. If so, please ask to speak privately to the Judge to advise what have you heard, whether you have formed any impression or opinion about what you have heard and what your impression or opinion is.

41. If you are selected as a juror in this case, can you commit to requiring the plaintiffs to prove their case based on all of the evidence and to follow the law as instructed by the Judge, even if you disagree with the law or would personally prefer a different outcome? If you are not completely sure, please explain.

42. If the plaintiffs failed to prove their case, would you be uncomfortable finding for the defendants and awarding the plaintiffs no money? If not, please explain.

II. LIST OF INDIVIDUALS, COMPANIES OR OTHER ENTITIES THAT MAY APPEAR AS WITNESSES OR OTHERWISE BE REFERRED TO AT TRIAL

1. Do you personally or professionally know any of the following people or, if a business, any people working for that business?
 - a. Ed Sheeran
 - b. Amy Wadge
 - c. Jake Gosling
 - d. Atlantic Recording Corporation d/b/a Atlantic Records
 - e. Warner Music UK
 - f. Sony/ATV Music Publishing LLC
 - g. Sony Music Publishing
 - h. Sony UK
 - i. EMI Music

- j. Stone Diamond
 - k. Jobete
 - l. Kathryn Townsend Griffin
 - m. Helen McDonald
 - n. Cherrigale Townsend
 - o. Ed Townsend
 - p. Marvin Gaye
 - q. Dr. Alexander Stewart
 - r. Dr. Lawrence Ferrara
 - s. Stuart Camp
 - t. John Beddia
 - u. Amy Cranford
 - v. Stephanie Hardwick
 - w. Barry Massarsky
 - x. David Pullman
 - y. Structured Asset Sales, LLC
2. The following lawyers and law firms will be involved in this case. Please let us know if you know of, or have heard of, any of the following law firms, these lawyers, or any other lawyers in these law firms:
- a. Frank & Rice, P.A.
 - b. Pryor Cashman LLP
 - c. The Parness Law Firm
 - d. Patrick R. Frank

- e. Keisha D. Rice
- f. Katherine L. Viker
- g. Ben Crump
- h. Donald S. Zakarin
- i. Ilene S. Farkas
- j. Andrew M. Goldsmith
- k. Hillel I. Parness

3. Please let us know if you own any stock in either of the following publicly traded companies: (1) Warner Music Group Corp. (Nasdaq Ticket WMG), or (2) Sony Group Corporation?

Dated: New York, New York
March 15, 2023

PRYOR CASHMAN LLP

By: /s/ Donald S. Zakarin

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